

1 Michael Gerard Fletcher (State Bar No. 070849)
2 mfletcher@frandzel.com
3 Gerrick M. Warrington (State Bar No. 294890)
4 gwarrington@frandzel.com
5 FRANDZEL ROBINS BLOOM & CSATO, L.C.
6 1000 Wilshire Boulevard, Nineteenth Floor
7 Los Angeles, California 90017-2427
8 Telephone: (323) 852-1000
9 Facsimile: (323) 651-2577
10 Attorneys for Secured Creditor
11 ARCHWAY BROADWAY LOAN SPE, LLC

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **LOS ANGELES DIVISION**

12 In re	Lead Case No. 2:24-bk-12079-VZ
13 SEATON INVESTMENTS, LLC, <i>et al.</i> ,	Jointly Administered with Case Nos.:
14 Debtors and Debtors-in-Possession.	2:24-bk-12080-VZ; 2:24-bk-12081-VZ; 2:24-bk-12082-VZ; 2:24-bk-12091-VZ; 2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and 2:24-bk-12076-VZ
16 Affects:	Chapter 11
17 <input checked="" type="checkbox"/> All Debtors <input type="checkbox"/> Seaton Investments, LLC <input type="checkbox"/> Colyton Investments, LLC <input type="checkbox"/> Broadway Avenue Investments, LLC <input type="checkbox"/> SLA Investments, LLC <input type="checkbox"/> Negev Investments, LLC <input type="checkbox"/> Alan Gomperts <input type="checkbox"/> Daniel Halevy <input type="checkbox"/> Susan Halevy	EVIDENTIARY OBJECTIONS TO DECLARATION OF ARI STOCK IN SUPPORT OF MOTION AUTHORIZING DEBTOR TO ENTER INTO POST- PETITION LEASE Date: December 12, 2024 Time: 11:00 a.m. Crtrm.: 1368 255 E. Temple Street Los Angeles, CA 90012
23	Hon. Vincent P. Zurzolo
24	
25	
26	
27	
28	

1 Secured creditor, Archway Broadway Loan SPE, LLC, a Delaware limited liability
2 company, successor in interest to Archway Real Estate Income Fund I REIT, LLC (“Archway”)
3 objects to and moves to strike certain portions of the Declaration Of Ari Stock In Support Of
4 Motion Authorizing Debtor To Enter Into Post-Petition Lease (“Stock Declaration”) (Dkt. 310-2)
5 filed by these jointly administered debtors.

No.	Testimony	Objections/Motion to Strike
1.	Stock Declaration ¶ 2 2:7–8: “Levav is in the healthcare business providing operational support of mental healthcare facilities. I have been in this business for 14 years.”	Lack of Foundation. Fed. R. Evid. 602. The quoted testimony lacks foundation.
2.	Exhibit B Levav’s Financial Statements	Hearsay. Fed. R. Evid. 802. The financial statements are not <i>Levav’s</i> financial statements. These documents are being offered for the truth of the matter asserted. No exception to the hearsay prohibition is applicable. The Court should exclude and strike the entire exhibit.

DATED: November 27, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

MICHAEL GERARD FLETCHER
GERRICK M. WARRINGTON

By: /s/ Gerrick M. Warrington

GERRICK M. WARRINGTON
Attorneys for Secured Creditor
ARCHWAY BROADWAY LOAN SPE, LLC